

United States District Court  
Eastern District of Michigan  
- Southern division -

Michael Mohamed Salami  
Plaintiff.

v.

Brian Trumbley  
Defendant.

Case No.: 19-cv-11558

Judge: George C. Steinhilber

Magistrate: Steven R. Whelan

Motion for Limited Appointment  
of Counsel by Plaintiff

Pursuant to 28 USC 1915 ~~(e)~~ Plaintiff, Michael Mohamed Salami, IN PRO SE, moves this Court to Grant her limited Appointment of Counsel for the sole purpose of discovery. For the following reasons:

1.3 A need for oral deposition heavily exists in this complex litigation, and the Prison is not providing any reasonable accommodations which are not burdensome economically. i.e. [allow Plaintiff to receive in house video-recorders] as allowed under Fed. R. Civ. P. 30 (3)(A) and [32] (C).

2.3 There are records in which the defendant will not release as their claim as "privileged" which would help her discover and locate witnesses and facts. Appointment of Counsel is appropriate. See Johnson v. Howard, 20 F. Supp. 2d 1128, 1129 (E.D. Mich. 1998); Gatson v. Coughlin, 679 F. Supp. 270, 273 (E.D. Mich. 1987).

3.3 Plaintiff has been assaulted due to defendant's refusal to provide protection or take her to segregation for actions and personal his previous actions. Appointment of Counsel is warranted. See, Johnson v. Howard, 20 F. Supp. 2d 1128, 1129 (E.D. Mich. 1998).

4.3 The entire factors shown simply fall under "Exceptional Circumstances" which have been shown, i.e. complexity, and legal issues involved. See Lavarlo v. Keeshan, 992 F.3d 605-606 (6th Cir. 1993); [Tabron v. Grace, 6 F.3d 147, 155, (3rd Cir. 1993)].

5.3 The claims brought by Plaintiff are complex. She has no access to Law Library, as book writer, is Dyslexic, Dyscalculic, ADHD, PTSD and Bipolar. She is making claims which are of sensitive nature and the Litigational facts are disputed by defendant and discovery is being "stonewalled" by defendant's Counsel on Police Quota for documents.

Swear-enth/Proof of Service:

I declare under Penalty of Perjury what is stated above is True/Correct 28 USC 1746 and on 1 April 2021, I sent this document via USPS First Class Postage to defendant's Counsel and used court of Michigan Clerk Office

1st Michael Mohamed Salami  
Michael Mohamed Salami  
mobile: 879045

34625 - 26 mile rd  
Lenox - Tuskegee, MI 48048

Date: 20th April, 2021

Vanessa Hinojosa  
NOTARY PUBLIC, STATE OF MICHIGAN  
COUNTY OF ST. CLAIR

MY COMMISSION EXPIRES: OCTOBER 17, 2022

ACTING COUNTY OF

Michael  
SALAMI  
879045 - mae ~~58~~ 4597  
34628 - 26 mile ed  
LENOX - twelve mi. 48048

Lebail - mail  
~~24~~ 19-cv-11558  
Salem v. Teambly.



To: U.S. Eastern District  
of Michigan  
- Clerk's Office -

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231 W. Lafayette Blvd., Ste 11.

Delaware, DE 19701-48048, USA

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